

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>RANDALL SCOTT MCKILLOP</b>	:	
	:	<b>CASE NO. 1:17-bk-00749</b>
<b>LISA MARIE MCKILLOP</b>	:	
	:	
<b>Debtor(s)</b>	:	
	:	
<b>WELLS FARGO HOME MORTGAGE</b>	:	
<b>Movant</b>	:	
	:	
<b>RANDALL SCOTT MCKILLOP</b>	:	
	:	
<b>LISA MARIE MCKILLOP</b>	:	
	:	
<b>Respondent(s)</b>	:	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. This paragraph paraphrases a portion of a document, which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied. The Debtor lacks knowledge or information sufficient to form a belief as to whether creditor, directly or through an agent, has possession of the promissory note and therefore the remainder of the paragraph is denied.
4. Admitted, except to the extent that the plan strips off junior liens..
5. Admitted.
6. Admitted. that the debtors fell behind; however, they intend to cure the arrearages either through an amended plan or stipulation.
7. Admitted.
8. Admitted. that the debtors fell behind; however, they intend to cure the arrearages either through an amended plan or stipulation and therefore the remainder of the paragraph is denied.
9. Denied. The Debtors intend to cure the arrearages either through an amended plan or stipulation.

10. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.
11. Denied. The Debtors intend to cure the arrearages either through an amended plan or stipulation.
12. Denied. The Debtors intend to cure the arrearages either through an amended plan or stipulation.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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